From: Hence, Kia [hence.kia@epa.gov]

Sent: 7/19/2017 3:49:03 PM

To: Joerger, Verena [joerger.verena@epa.gov]

Subject: FW: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

Attachments: Monitors4May2016_MD.docx

From: Joel Dreessen -MDE- [mailto:joel.dreessen@maryland.gov]

Sent: Wednesday, May 03, 2017 2:17 PM **To:** Hence, Kia <hence.kia@epa.gov>

Cc: Michael Woodman -MDE- <Michael.woodman@maryland.gov>; Jennifer Hains <jennifer.hains@maryland.gov>;

Chow, Alice <chow.alice@epa.gov>; david.krask@maryland.gov; Hyden, Loretta <Hyden.Loretta@epa.gov>

Subject: Re: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

Kia, Thank you for the detailed response. We will proceed with the EE analysis according to this guidance.

I also want to apologize for sending the wrong document on Monday. The correct one I meant to send is now attached, but also is now no longer relevant:)

Please disregard that old draft sent mistakenly.

Joel

On Wed, May 3, 2017 at 12:10 PM, Hence, Kia hence.kia@epa.gov> wrote:

Hi Joel,

I thought it might be more clear if answered your questions by addressing each of the monitors on the table below. Please see my comments in the last two columns. In case I stated anything incorrectly, I've copied Ben, Beth (OAQPS) and Maria (R3 Planning Group) on this email. I struck though and grayed out the monitors (or dates) that shouldn't be requested for data exclusion in the demonstration based on the criteria in 40 CFR 50.14(a)(1)(i):

| AQS SITE CODE | Site Name | 2016: 4th Maximum (Including May EE) | | 08AO ank) May 26, 2016 | 2016 Design Value (including May EE) | 2016 Design Value (excluding May EE) | EPA R3 Comment | Potential Reg |
|---------------------|-----------|-----------------------------------------------|-----------|------------------------------------|--------------------------------------------------|--------------------------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 24- 025- 9001 | ALDINO | 0.077 | 77 (3) | 79 (2) | 0.073 | 0.073 | Eligible for a data exclusion request. Meets criteria by having | Excluding the ever value still violates Not aware of any regulatory decisi- for this monitor co O ₃ NAAQS. |

[&]quot;This section applies to the treatment of data showing <u>exceedances or violations</u> of any national ambient air quality standard <u>for purposes of</u> the following <u>types of regulatory determinations</u> by the Administrator:.."

| | | | | | | | exceedances greater than 70ppb (i.e. ≥71ppb). | |
|---------------------------------|------------------------------|-------|----------------------|-------------------|-------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| 24- 933 - 9991 | BELTSVILLE CASNET | 0.070 | 76 (2) | 72 (3) | 0.068 | 0.068 | Only request | rs are part of the C data exclusion for t ent air monitoring r |
| 24- 049- 9994 | BLACKWATER NWR CASTNET | 0.068 | 70 (3) | 76 (1) | 0.066 | 0.065 | | |
| 24- 009- 0011 | CALVERT | 0.070 | 70 (4) | 75 (1) | 0.069 | 0.068 | Eligible only for a data exclusion request for the exceedance on 5/26/16. The measured concentration on 5/25/16 is not an exceedance since it is not greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the therefore no viola any regulatory decisions/determinenitor concerninenitor concerninental |
| 24- 025- 1001 | EDGEWOOD | 0.079 | 79 (4) | 80 (2) | 0.073 | 0.073 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Excluding the ever value still violates Not aware of any decisions/determing monitor concerning NAAQS. |
| 24- 005- 3001 | ESSEX | 0.078 | 78 (4) | 81 (2) | 0.072 | 0.072 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Excluding the ever value still violates Not aware of any decisions/determing monitor concerning NAAQS. |

| 24- 015- 0003 | FAIR HILL | 0.080 | 83 (2) | 76 (5) | 0.076 | 0.074 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | 2008 O ₃ NAAQS attainment deternation and any regulatory decision for this monitor condition of NAAQS. |
|---------------------|-------------|-------|----------------------|-------------------|------------------|-------|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| 24- 021- 0037 | FREDERICK | 0.070 | 70 (4) | 65 (8) | 0.067 | 0.066 | Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the therefore no viola any regulatory decisions/determinenitor concerninenitor concerninenitor |
| 24- 510- 0054 | FURLEY | 0.075 | 75 (4) | 78 (2) | 0.069 | 0.066 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the therefore no viola any regulatory decisions/determ monitor concerning NAAQS. |
| 24- 003- 1003 | GLEN BURNIE | 0.076 | 75 (6) | 76 (4) | 0.076 | 0.076 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Excluding the ever value still violates Not aware of any decisions/determ monitor concerning NAAQS. |
| 24- 043- 0009 | HAGERSTOWN | 0.070 | 68 (5) | 61(18) | 0.066 | 0.066 | Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥71ppb). | Including the eve value is below the there is no violation any regulatory decisions/determ monitor concerning NAAQS. |
| 24- 019- 0004 | HORN POINT | 0.067 | 71 (2) | 77 (1) | 0.064 | 0.064 | Eligible for a data exclusion request. Meets criteria by having | Including the eve value is below the there is no violation any regulatory decisions/determ |

| | | | | | | | exceedances greater than 70ppb (i.e. ≥71ppb). | monitor concernir NAAQS. |
|---------------------|-----------------|-------|-----------|--------|-------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| 24- 033- 0030 | HOWARD U | 0.070 | 74 (2) | 74 (2) | 0.069 | 0.068 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the there is no violation any regulatory decisions/determination concerning NAAQS. |
| 24- 029- 0002 | MILLINGTON | 0.072 | 85 (1) | 76 (2) | 0.070 | 0.069 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the there is no violation any regulatory decisions/determinanitor concerninal NAAQS. |
| 24- 005- 1007 | PADONIA | 0.073 | 74 (3) | 84 (1) | 0.072 | 0.072 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Excluding the ever value still violates Not aware of any regulatory decision for this monitor con O ₃ NAAQS. |
| 24- 033- 8003 | PG EQ CENTER | 0.076 | 74 (5) | 69-(8) | 0.071 | 0.071 | Eligible only for a data exclusion request for the exceedance on 5/25/16. The measured concentration on 5/26/16 is not an exceedance since it is not greater than 70ppb (i.e. ≥71ppb). | Excluding the ever value still violates Not aware of any decisions/determing monitor concerning NAAQS. |

| 24- 023- 0002 | PINEY RUN | 0.066 | 64 (7) | 53 (4) | 0.065 | 0.065 | Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the therefore no viola any regulatory decisions/determi monitor concernir NAAQS. |
|---------------------|-------------|-------|----------------------|--------------------|-------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| 24- 031- 3004 | ROCKVILLE | 0.068 | 69 (2) | 6 7 (6) | 0.068 | 0.068 | Not eligible for a data exclusion request. Doesn't meet exceedance criteria of greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the therefore no viola any regulatory decisions/determinenitor concernirental NAAQS. |
| 24- 013- 0001 | S. CARROLL | 0.072 | 72 (4) | 75 (2) | 0.068 | 0.067 | Eligible for a data exclusion request. Meets criteria by having exceedances greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the therefore no viola any regulatory decisions/determi monitor concernir NAAQS. |
| 24- 017- 0010 | S. MARYLAND | 0.073 | 69 (7) | 73 (4) | 0.070 | 0.070 | Eligible only for a data exclusion request for the exceedance on 5/26/16. The measured concentration on 5/25/16 is not an exceedance since it is not greater than 70ppb (i.e. ≥71ppb). | Including the ever value is below the therefore no viola any regulatory decisions/determi monitor concernir NAAQS. |

Let me know if you have any questions.

Kía Long

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"We are what we repeatedly do. Excellence then, is not an act, but a habit." - Aristotle

From: Joel Dreessen -MDE- [mailto:joel.dreessen@maryland.gov]

Sent: Monday, May 01, 2017 4:24 PM **To:** Hence, Kia < hence.kia@epa.gov>

Cc: Michael Woodman -MDE- < Michael.woodman@maryland.gov >; Jennifer Hains < jennifer.hains@maryland.gov >;

Chow, Alice <chow.alice@epa.gov>; david.krask@maryland.gov; Hyden, Loretta <Hyden.Lorretta@epa.gov>

Subject: Re: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

Kia,

Thanks for speaking with us on Friday concerning our draft demonstration of the May event. To follow-up with what we discussed on the call, we would like to clarify which monitors we are allowed to pursue and in what fashion before I start making significant edits.

Based on our conversation, my understanding is that MDE may pursue all monitors that exceeded 70ppb during the event, but only for those particular days. Attached is a table of 16 monitors that had at least 1 exceedance day during the event. Those days we are seeking exclusion for are highlighted in red in the table. There would be 28 data points up for exclusions in this case.

The other criteria for exclusion we discussed was a monitor has a DV above the NAAQS. There are 7 monitors which have a 2016 DV greater than 70ppb, with one (Fair Hill) greater than 75ppb. These are highlighted in orange on the second table. These 7 monitors are already included within the list of monitors which exceeded 70ppb during the event. However, PG EQ Cnt did not exceed 70ppb, but still has a DV above 70ppb. Can we pursue exclusion on both days for that monitor?

Lastly, Maryland was initially pursuing exclusion of all monitors which observed an 8-hour ozone concentration which was one of the top 4 highest of 2016. This would add an additional two monitors for exclusion consideration and an additional 5 data points in total which were not >70ppb but which fall in the top 4 highest observations points of 2016 (data points are colored green in third table). Considering the Exceptional Events Guidance document discusses a Tier 2 demonstration being acceptable based on data being within the fourth highest ranking in a given year, would these 5 additional data points also be considered by EPA as exclusion worthy? These fourth high data points may become important for DVs in 2017 and 2018.

We just wanted to check with you one last time and finalize things before I started making sizable edits to our draft. Thanks for clarifying this for us!

Joel

See attached for tables.

On Wed, Apr 26, 2017 at 8:27 PM, Hence, Kia < hence.kia@epa.gov > wrote:

Ahead of Friday's call I'm attaching EPA's comments for MDE's draft EE demo.

Kía Long

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"We are what we repeatedly do. Excellence then, is not an act, but a habit." - Aristotle

From: Joel Dreessen -MDE- [mailto:joel.dreessen@maryland.gov]

Sent: Wednesday, April 05, 2017 12:05 PM

To: Hence, Kia < hence.kia@epa.gov >; joel.dreessen@maryland.gov

Cc: Hyden.lorretta@epa.gov; Chow, Alice <chow.alice@epa.gov>; Michael Woodman -MDE-

< <u>Michael.woodman@maryland.gov</u>>; <u>david.krask@maryland.gov</u>; Jennifer Hains < <u>jennifer.hains@maryland.gov</u>>

Subject: May 2016 Fort McMurray Maryland Exceptional Event Demonstration - Draft

MDE has completed a draft demonstration of the May 2016 Fort McMurray fire's impact on ozone concentrations in Maryland on May 25 and 26, 2016. The draft is attached. Thank you for this initial informal review.

Joel

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Publication: June 2015 Smoke & Ozone Event

<u>Click here</u> to complete a three question customer experience survey.

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